

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 EARLY SULLIVAN WRIGHT
4 GIZER & McRAE LLP
5 601 South Seventh Street, 2nd Floor
6 Las Vegas, Nevada 89101
7 Telephone: (702) 331-7593
8 Facsimile: (702) 331-1652

9 Devin A. McRae, *Pro Hac Vice*
10 *dmcrae@earlysullivan.com*
11 EARLY SULLIVAN WRIGHT
12 GIZER & McRAE LLP
13 6420 Wilshire Boulevard, 17th Floor
14 Los Angeles, California 90048
15 Telephone: (323) 301-4660
16 Facsimile: (323) 301-4676

17 Erik C. Alberts, *Pro Hac Vice*
18 *erik.alberts@ealawfirm.net*
19 LAW OFFICES OF ERIK C. ALBERTS
20 5900 Wilshire Boulevard, 26th Floor
21 Los Angeles, California 90036
22 Telephone: (323) 330-0583
23 Facsimile: (323) 330-0584

24 Attorneys for Plaintiff
25 KARL E. RISINGER, and those similarly situated

26 Tara Lee, *Pro Hac Vice*
27 *taralee@quinnemanuel.com*
28 Keith H. Forst, *Pro Hac Vice*
keithforst@quinnemanuel.com
QUINN EMANUEL URQUHART & SULLIVAN, LLP
1300 I Street, NW, Suite 900
Washington, DC 20005
Tel.: (202) 538-8000
Fax: (202) 538-8100

29 Daniel P. Mach, *Pro Hac Vice*
30 *danielmach@quinnemanuel.com*
31 QUINN EMANUEL URQUHART & SULLIVAN, LLP
32 51 Madison Avenue, 22nd Floor
33 New York, NY 10010
34 Tel: (212) 849-7066
35 Facsimile: (212) 847-7100

36 E. Leif Reid, SBN 5750
37 *lreid@lrrc.com*
38 Kristen L. Martini, SBN 11272
39 *kmartini@lrrc.com*
40 LEWIS ROCA ROTHGERBER CHRISTIE LLP

1 One East Liberty Street, Suite 300
2 Reno, NV 89501-2128
3 Tel.: (775) 823-2900
4 Fax: (775) 839-2929
lreid@lrrc.com
kmartini@lrrc.com

5 *Attorneys for Defendants*

6
7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 KARL E. RISINGER, an individual, on
12 behalf of himself and all others similarly
situated,

13 Plaintiff,

14 vs.

15 SOC LLC, a Delaware limited liability
16 company registered and doing business in
17 Nevada as SOC NEVADA LLC; SOC-SMG,
18 INC., a Nevada corporation; DAY &
ZIMMERMANN, INC., a Maryland
corporation; and DOES 1-20, inclusive,

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No.: 2:12-cv-00063-MMD-PAL

**STIPULATION TO EXTEND CASE
DEADLINES**
(Third Request)

1 WHEREAS, on April 6, 2018, the Court granted the parties' joint stipulation
2 (ECF No. 236) regarding the pretrial schedule for Phase Two discovery and pretrial deadlines
3 (ECF No. 239);

4 WHEREAS, on May 23, 2018, counsel for Plaintiff informed Defendants that Plaintiff's
5 expert William Buckley is unavailable for deposition before the existing June 1, 2018 deadline
6 because of scheduling issues for Mr. Buckley and Plaintiff's counsel;

7 WHEREAS, the parties also cannot complete the depositions of Defendants' experts
8 before the existing June 1, 2018 deadline because of scheduling issues;

9 WHEREAS, the parties wish to extend the deadline to allow for the completion of the
10 expert depositions; and

11 WHEREAS, this request for an extension of the pretrial case deadlines will not prejudice
12 the overall schedule as the Court has not yet set a trial date;

13 NOW THEREFORE, the parties hereby stipulate and agree to the following:

14 DISCOVERY SCHEDULE

15 1. All expert witness depositions on the issue of damages must be completed no later
16 than June 22, 2018.

17 TRIAL DEADLINES

18 2. Plaintiff shall submit his trial plan on or before July 9, 2018.

19 3. Plaintiff and Defendants will file a joint pretrial order on July 23, 2018.
20

21 Dated: May 25, 2018

EARLY SULLIVAN WRIGHT GIZER & McRAE
LLP

22
23 By: /s/ Scott E. Gizer
SCOTT E. GIZER
24 DEVIN A. MCRAE
25 Attorneys for Plaintiff
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: May 25, 2018

QUINN EMANUEL URQUHART & SULLIVAN
LLP

By: /s/ Tara Lee
TARA LEE
KEITH H. FORST
DANIEL P. MACH
Attorneys for Defendants

In association with:
E. LEIF REID
KRISTEN L. MARTINI
Attorneys for Defendants

ORDER

IT IS SO ORDERED.

Dated this 1st day of June, 2018


UNITED STATES MAGISTRATE JUDGE